

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**DISPLAY TECHNOLOGIES, LLC,**

Plaintiff,

v.

**C&A IP HOLDINGS, LLC,**

Defendant.

**Civil Action No. 2:15-cv-1633**

**JURY TRIAL DEMANDED**

**PLAINTIFF DISPLAY TECHNOLOGIES LLC'S ANSWER TO DEFENDANT C&A IP  
HOLDINGS, LLC'S COUNTERCLAIMS**

Plaintiff, Display Technologies LLC ("Plaintiff"), answers the Counterclaims of Defendant C&A IP Holdings, LLC ("Defendant") filed December 15, 2015 (Dkt. No. 14). Plaintiff answers the Counterclaims of Defendant by corresponding paragraph number as follows:

**COUNTERCLAIMS**

**PARTIES**

1. Admitted.
2. Admitted.

**JURISDICTION AND VENUE**

3. Plaintiff admits Defendant seeks judicial declarations of non-infringement and invalidity of U.S. Patent No. 8,671,195 ("195 patent"). However, Plaintiff denies that Defendant is entitled to any such relief. Except as so admitted, the remaining allegations in paragraph 3 are denied.

4. Plaintiff admits that these counterclaims purport to arise under 28 U.S.C. §§ 1331, 1367, and 1338(a). Plaintiff further admits that an actual, substantial, and continuing justiciable

controversy exists between Defendant and Plaintiff in regards to Defendant's Infringement of the '195 Patent. Except as so admitted, the remaining allegations in paragraph 4 are denied.

5. Admitted.

6. Plaintiff admits that venue is proper in regards to Defendant's infringement of the '195 Patent. Except as so admitted, the remaining allegations in paragraph 6 are denied.

**COUNT I**  
**DECLARATION OF NON-INFRINGEMENT OF THE '195 PATENT**

7. Plaintiff incorporates by reference the allegations and statements set forth in the preceding paragraphs of these Answers to Defendant's Counterclaims in their entirety as if set forth herein.

8. Denied.

9. Plaintiff admits an actual case or controversy exists in regards to Defendant's infringement of the '195 Patent. Except as so admitted, the remaining allegations in paragraph 9 are denied.

10. Denied.

11. Plaintiff admits that Defendant seeks a judicial declaration of non-infringement in regards to the '195 Patent. However, Plaintiff denies that Defendant is entitled to any such relief. Except as so admitted, the remaining allegations in paragraph 11 are denied.

12. Denied.

**COUNT II**  
**DECLARATION OF INVALIDITY OF THE '195 PATENT**

13. Plaintiff incorporates by reference the allegations and statements set forth in the preceding paragraphs of these Answers to Defendant's Counterclaims in their entirety as if set forth herein.

14. Denied.

15. Plaintiff admits an actual case or controversy in regards to Defendant's infringement of the '195 Patent. Except as so admitted, the remaining allegations in paragraph 15 are denied.

16. Denied.

17. Plaintiff admits that Defendant seeks a judicial declaration of invalidity in regards to the '195 Patent. However, Plaintiff denies that Defendant is entitled to any such relief. Except as so admitted, the remaining allegations in paragraph 17 are denied.

18. Denied.

#### **DEMAND FOR JURY TRIAL**

Defendant's Demand for Jury Trial is an averment to which no responsive pleading is required pursuant to FED. R. CIV. P. 8(d) and is therefore denied.

#### **PRAYER FOR RELIEF**

Defendant's Prayer for Relief is an averment to which no responsive pleading is required pursuant to FED. R. CIV. P. 8(d) and is therefore denied.

DATED January 5, 2016.

Respectfully submitted,

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**ATTORNEYS FOR PLAINTIFF  
DISPLAY TECHNOLOGIES, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 5th day of January, 2016, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Marshall Division, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Krystal L. Gibbens  
Krystal L. Gibbens